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January 26, 2006

The Honorable Kent A. Jordan
U.S. District Court
844 North King Street, Room 4209
Lock Box 10
Wilmington, DE 19801

RE: Valerie Hue, Plaintiff v. NCO Financial Systems, Inc.
Case No.: 05-225 KAJ
Discovery Dispute

Dear Judge Jordan:

Our firm represents the plaintiff in the above matter. The plaintiff recently requested a teleconference regarding a discovery dispute. The teleconference is scheduled for today, January 26, 2006 at 3:30 p.m. This letter explains that the parties have reached an agreement which would resolve the discovery dispute, provided that Your Honor approves the attached agreed upon stipulation and order. This letter explains the reasoning of the stipulation.

The dispute revolves primarily around plaintiff's desire to depose several witnesses. Although certain days had been set aside by the parties for the depositions, there are logistical problems in finishing the depositions by the discovery deadline which is February 28, 2006. Among other things, the witnesses reside in several states around the country, and many of them are ex-employees of the defendant which complicates the scheduling of their depositions. Both parties agree that more time is needed to finish the depositions (plaintiff's first deposition is scheduled for January 31, 2006). The parties have also agreed to reduce the total number of hours for the depositions from 100 to 75, and to expand the number of deponents to 21. My letter yesterday to the court explains plaintiff's reasoning for the 21 witnesses.

Although the scheduling order would be amended to extend the discovery deadline to April 28, 2006 and the case dispositive motions deadline to May 19, 2006, the trial dates and

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pretrial conference dates would not be affected. They are September 18, 19, 20, 26 and 26, 2006, and August 16, 2006, respectively.

Counsel for defendants have reviewed this letter and the attached proposed stipulation and order and agree with the content of both. If the stipulation is acceptable, we will not need the teleconference scheduled for today.

Thank you for your consideration.

Respectfully submitted,



JEREMY W. HOMER

Bar ID #413

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